From: Aleta Kennedy 206-941-1098
To: Contact OGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Thursday, June 16, 2022 9:52:17 PM

I oppose OGE's proposed legal expense fund regulation as drafted. OGE should:1. Remove the exception that makes compliance with the regulation optional. There is no acceptable "option" to ethical behavior. The American people have had enough.
2. Replace the proposed recusal requirement with a broader 5-year recusal requirement that prevents donors of cash gifts from influencing decisions, policies, or regulations affecting them or the industries in which they have substantial interests. One year is insufficient.
3. Remove the offensive example involving an accused sexual harasser.
4. Place nonprofit charities (501(c)(3) organizations) on an equal footing with large law firms by allowing them to hire legal counsel for whistleblowers.
Clearly, we need to improve and tighten ethics rules after the debacle that began in 2016. Your office, in particular, needs stricter and more enforced rules, NOT more lax ones, if your credibility is to be restored and the trust of the majority in the country is to be renewed.
Best wishes,
Aleta Kennedy

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Aleta Kennedy